

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JUSTA MORALES

Plaintiff,

07-CV 6286 (GBD)

-against-

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

Defendant,

CITIGROUP, formerly known as
National City Bank of New York

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern and Eastern District of New York, I, Jeffrey A. Lichtman, a member of good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Reinaldo J. Dorta, Jr.
Firm Name: Dorta & Ortega, P.A.
Address: 800 S. Douglas Road, Suite 149
City/State/Zip: Coral Gables, FL 33134
Phone Number: (305)461-5454
Fax Number: (305)461-5226

Reinaldo J. Dorta, Jr. is a member in good standing of the Bar of the State of Florida.

There are no pending disciplinary proceedings against Reinaldo J. Dorta, Jr. in any State or Federal Court.

Dated: September 5, 2007
City, State: New York, New York

Respectfully submitted,

Jeffrey A. Lichtman
SDNY Bar: 8258
Firm Name: Trolman, Glaser and Lichtman
Address: 777 Third Avenue
City/State/Zip: New York, NY 10017
Phone Number: (212)750-1200
Fax Number: (212)980-4011

FILED
U.S. DISTRICT COURT
2007 SEP 27 AM 11:13
S.D. OF N.Y.

62-607-6 ST 68189

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via facsimile and U.S. Mail on this 26th day of September, 2007 upon:¹

Elena M. Marlow,
emerlow@astidavis.com
Astigarraga Davis Mullins and Grossman, P.A.
701 Brickell Avenue, 16th Floor
Miami, FL 33131
(305)372-8282
(305)372-8202
Attorneys for Defendant



OMAR ORTEGA

¹ The original was sent on September 10, 2007 but was returned by the Clerk on the 25th of September requesting an original signature on the Certificate of Service.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JUSTA MORALES

Plaintiff,

07-CV 6286 (GBD)

-against-

**AFFIDAVIT OF JEFFREY A. LICHTMAN
IN SUPPORT OF MOTION TO ADMIT
COUNSEL PRO HAC VICE**

Defendant,


CITIGROUP, formerly known as
National City Bank of New York

Jeffrey A. Lichtman, being duly sworn, hereby deposed and says as follows:

1. I am a partner at Trolman, Glaser and Lichtman, counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Reinaldo J. Dorta, Jr., as counsel pro hac vice to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1979. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Reinaldo J. Dorta, Jr. since 2007.
4. Mr. Dorta is a partner at Dorta & Ortega, P.A. in Coral Gables, Florida.
5. I have found Mr. Dorta to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Reinaldo J. Dorta, Jr., pro hac vice.
7. I respectfully submit a proposed order granting the admission of Reinaldo J. Dorta, Jr., pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Reinaldo J. Dorta, Jr., pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Dated: September 5, 2007
City, State: New York, New York

Notarized: 

ALEXANDRA SCHEPIS
Commissioner of Deeds
City of New York-No. 4-4383
Certificate Filed in Queens County
Commission Expires September 1, 2008

Respectfully submitted,


Jeffrey A. Lichtman

SDNY Bar: 8258

Firm Name: Trolman, Glaser and Lichtman

Address: 777 Third Avenue

City/State/Zip: New York, NY 10017

Phone Number: (212)750-1200

Fax Number: (212)980-4011

AO 136
(Rev. 6/82)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA



CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA
SOUTHERN DISTRICT OF FLORIDA

}

Fla. Bar. # 84920

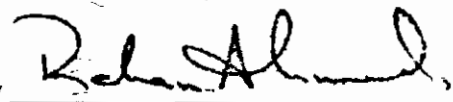
I, **CLARENCE MADDOX**,

Clerk of the United States District Court
for the Southern District of Florida,

DO HEREBY CERTIFY that ***Reinaldo J. Dorta, Jr.*** was duly admitted to
practice in said Court on **10/15/1999**, and is in good standing as a member of the bar of this Court.

Dated at: **Miami, Florida**, this September 10, 2007

CLARENCE MADDOX
Court Administrator • Clerk of Court

By 
Deputy Clerk

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JUSTA MORALES

Plaintiff,

07-CV 6286 (GBD)

-against-

**ORDER ON ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Defendant,

CITIGROUP, formerly known as
National City Bank of New York

Upon the motion Reinaldo J. Dorta, Jr. attorney for Plaintiff, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: Reinaldo J. Dorta, Jr.
Firm Name: Dorta & Ortega, P.A.
Address: 800 S. Douglas Road, Suite 149
City/State/Zip: Coral Gables, FL 33134
Phone Number: (305)461-5454
Fax Number: (305)461-5226

Is admitted to practice pro hac vice as counsel for Plaintiff in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rule governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: _____
City, State: _____

United States District/Magistrate Judge